UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,	)
	)
Plaintiff,	)
	)
vs.	) Case No.: 4:16-cr-176-2 CDP (DDN)
	)
SHAYNE JONES,	)
	)
Defendant.	)

DEFENDANT'S OBJECTIONS TO THE PRESENTENCE INVESTIGATION REPORT

COMES NOW Defendant, Shayne Jones, by and through counsel, and files the following objections to the Presentence Investigation Report ("PSR"):

1. **Paragraph 28**: A firearm was not taken during the offense and "the taking of such [an] item was [not] an object of the offense." Accordingly, Defendant should not receive a one-level increase under U.S.S.G. § 2B3.1(b)(6).

2. **Paragraph 33**: Defendant's adjusted offense level is 26, not 27.

3. **Paragraph 36**: Defendant's total offense level is 24, not 25.

4. **Paragraph 72**: Defendant's Count I guideline range of imprisonment is 51 to 63 months, not 57 to 71 months.

4. **Paragraph 82**: The fine range for this offense is $20,000 to $200,00, not $30,000 to $300,000.

5. **Paragraph 97(3)**: Defendant should not have to submit to periodic drug tests. Defendant used marijuana on weekends from roughly age 17 to 22. See PSR at ¶ 52. He has not

used marijuana in at least seven years and did not use it chronically when he did.

6. **Paragraph 99**: For the reasons noted in paragraph 5, Defendant should not have to submit to substance abuse testing.

Respectfully submitted,

ROSENBLUM FRY, P.C.,

By: /S/ ADAM D. FEIN

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CERTIFICATE OF SERVICE

I hereby certify that on February 27, 2017, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Mr. Thomas Mehan assistant United States attorney.